

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WAG Acquisition, L.L.C., Plaintiff, v. Sobonito Investments, LTD., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-01661 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. Multi Media, L.L.C., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-02340 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. Data Conversions, Inc., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-02345 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. Flying Crocodile, Inc., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-02674 (ES)(MAH)

WAG Acquisition, L.L.C., Plaintiff, v. Gattyán Group S.à r.l., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-02832 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. FriendFinder Networks Inc., <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-03456 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. Vubeology, Inc. <i>et al.</i> , Defendants.	Civil Action No. 2:14-cv-04531 (ES)(MAH)
WAG Acquisition, L.L.C., Plaintiff, v. WEBPOWER, Inc. d/b/a WP Associates <i>et al.</i> , Defendants.	Civil Action No. 2:15-cv-3581 (ES)(MAH)

[PROPOSED] ORDER PURSUANT TO FED. R. EVID. 502(d)

Because the parties to this case or third parties may be required to produce documents, answer interrogatories, and provide testimony and other information that may contain information covered by the attorney-client privilege or work product protection, and in order to permit discovery to proceed without delay and avoid possible disputes regarding the privileged or protected nature of such information, the Court hereby **ORDERS**:

1. No waiver of attorney-client privilege and/or work product protection for any information or materials shall be deemed to have been made by reason of disclosure in connection with this litigation.
2. Any such disclosure shall also not be a waiver in any other federal or state proceedings.
3. This Order shall be interpreted to provide the greatest protection allowed by Fed. R. Evid. 502(d), or otherwise permitted by law.
4. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents or information for relevance, responsiveness, and/or segregation of privileged and/or protected information before production.

IT IS SO ORDERED.

Dated this ____ day of January 2016

Michael A. Hammer, U.S.M.J.